

STATE OF INDIANA)

COUNTY OF ALLEN)

RUTH TRUMBULL)

Plaintiffs,)

V.)

WAL-MART STORES, INC. and)
WAL-MART STORES EAST, LP)
d/b/a WAL-MART,)
Defendant.)

SS:

IN THE ALLEN SUPERIOR COURT

CAUSE NO.

02D02- 14 12 - CT - 000570

COMPLAINT FOR DAMAGES

Comes now Plaintiff, Ruth Trumbull (hereinafter referred to as "Trumbull"), by counsel, Justin A. Lebamoff, of Lebamoff Law Offices, A Professional Corporation, and for her causes of action against Defendant, Wal-Mart Stores, Inc., state as follows:

1. At all relevant times hereto, the Trumbull were residents of Allen County, Indiana.
2. At all relevant times hereto, Defendant, Wal-Mart Stores, Inc., was a corporation doing business within the State of Indiana.
3. On or about December 31, 2012, Ruth Trumbull was on the premises of the Defendant as a business invitee. Defendant's premises is located in Allen County, Indiana.
4. While walking on the premises, Ruth Trumbull slipped and fell due to water which Defendant allowed to accumulate.
5. The Defendant, by and through its agents and employees, had a legal duty to maintain its premises in a reasonably safe condition for the protection of its business invitees.
6. The Defendant, by and through its agents and employees, had a legal duty to

EXHIBIT "A"

notify business invitees of dangerous conditions and hidden perils located on its premises.

7. The Defendant was negligent in the maintenance of its premises.

8. The Defendant was negligent by failing to keep the premises clear of accumulating water and failing to warn business invitees of dangerous and hidden perils.

COUNT I

Comes now the Plaintiff, Ruth Trumbull, by counsel, and for the first cause of action against Defendant, states as follows:

9. Ruth Trumbull herein incorporates rhetorical paragraphs 1 through 8 as if specifically set forth herein.

10. As a direct and proximate result the Defendant's negligent and/or reckless conduct, Ruth Trumbull suffered personal injuries.

11. As a further direct and proximate result of the Defendant's negligent and/or reckless conduct, Ruth Trumbull has incurred expenses for medical treatment of her personal injuries.

12. As a further direct and proximate result of Defendant's negligent and/or reckless conduct, Ruth Trumbull has suffered physical pain and mental suffering.

WHEREFORE, Plaintiff, Ruth Trumbull prays for the following relief:

1. Compensatory damages;
2. Prejudgment interest;
3. Cost of this action; and
4. All other just and proper relief in the premises.

Respectfully submitted,

LEBAMOFF LAW OFFICES

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